

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

-----X
**BRUCE E. KATZ, M.D., P.C., D/B/A JUVA
 SKIN AND LASER CENTER**, individually
 and on behalf of all others similarly situated,

Plaintiff,

v.

DALE PHARMACY & SURGICAL, INC.,

Defendant.

-----X

Case No. 20-cv-01876-WFK-SJB

PROPOSED DISCOVERY PLAN

Plaintiff Bruce E. Katz, M.D., P.C. d/b/a Juva Skin and Laser Center (“Juva” or “Plaintiff”) and Defendant Dale Pharmacy & Surgical, Inc. (“Dale Pharmacy” or “Defendant”) submit the following proposed Discovery Plan, based on the Court’s Discovery Plan Worksheet.

PHASE 1	PROPOSED DATE
Deadline for completion of Rule 26(a) initial disclosures	July 17, 2020
Completion of Phase 1 Discovery	September 11, 2020
Initial settlement conference	Week of September 21-25, 2020

PHASE 2	PROPOSED DATE
Motion to join new parties or amend pleadings	October 12, 2020
First requests for production of documents and for interrogatories due	October 27, 2020
All fact discovery completed	March 1, 2021

PHASE 2	PROPOSED DATE
Plaintiff's Motion for Class Certification Due	March 15, 2021
Exchange of expert reports	April 1, 2021
Expert deposition deadline	May 1, 2021
Completion of all discovery	May 1, 2021
Final date to take first step in dispositive motion practice	June 1, 2021
Referral to mediation program	No

Undersigned counsel certifies that Michael Premisler, counsel for Defendant, consented to the filing of this proposed schedule.

Respectfully Submitted,

**BRUCE E. KATZ, M.D., P.C., d/b/a JUVA
SKIN AND LASER CENTER**, individually and
on behalf of class of similarly situated individuals

Dated: July 2, 2020

By: /s/ Patrick H. Peluso

Shawn Kassman
shawnkassman@centralisliplawyer.com
Law Office of Shawn Kassman, Esq. PC
110 Carleton Avenue
Central Islip, New York 11722
Tel: 631-232-9479
Fax: 631-232-9489

Patrick H. Peluso*
ppeluso@woodrowpeluso.com
Taylor T. Smith*
tsmith@woodrowpeluso.com
Woodrow & Peluso, LLC

3900 E Mexico Avenue, Suite 300
Denver, CO 80210
Tel: 720.213.0675
Fax: 303.927.0809

**Pro hac vice*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above titled document was served upon counsel of record by filing such papers via the Court's ECF system on July 2, 2020.

/s/ Patrick H. Peluso